

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LEON D. BLACK,

Plaintiff,

-against-

GUZEL GANIEVA, WIGDOR LLP,
JOSH HARRIS, and STEVEN RUBENSTEIN,

Defendants.

Case No. 21-cv-8824 (PAE)

**NOTICE OF
MOTION TO DISMISS**

PLEASE TAKE NOTICE that, upon (i) the Memorandum of Law in Support of Defendant Josh Harris's Motion to Dismiss the Amended Complaint and (ii) the Declaration of Paul Spagnoletti in Support of Defendant Josh Harris's Motion to Dismiss the Amended Complaint, dated March 4, 2022, and the exhibits annexed thereto, Defendant Josh Harris, by and through his attorneys Davis Polk & Wardwell LLP, will move this Court before the Honorable Paul A. Engelmayer at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, Courtroom 1305, on a date and time to be set by the Court, for an order dismissing with prejudice the Amended Complaint as against him, pursuant to Rules 12(b)(6) and 9(b) of the Federal Rules of Civil Procedure for failure to state a claim and failure to plead fraud with particularity, as well as for such other and further relief that this Court deems just and proper.

Dated: March 4, 2022
New York, New York

Respectfully submitted,

DAVIS POLK & WARDWELL LLP

By: /s/ Paul Spagnoletti

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